

John Gauvin's Comments on how Revised Proposal 8 meets SSL Committee Goal and Objectives (in Blue):

Goal: Develop regulatory changes to the Atka mackerel, Pacific cod, and pollock fisheries' SSL mitigation measures that continue to meet the mandates of the ESA, MMPA, MSFCMA, and other applicable laws, while conserving marine biodiversity and sustaining viability of the diverse fishing communities dependent upon the Alaska fishery resources. **Proposal 8 as revised would open up some fishing areas in the Bering Sea for Atka mackerel. Currently, all known areas for mackerel fishing in the Bering Sea are closed. The allowance for some mackerel fishing between 10 and 20 miles of the listed SSL sites is requested to support the shift of a larger portion of the mackerel TAC to the Eastern AI/Bering Sea management area. Catching a larger fraction of the mackerel TAC in the AI 541 management area reduces mackerel fishing in the AI management areas to the west were SSL numbers have continued to decline. Additional fishing grounds are needed to support the TAC shift because currently the entire 541 TAC is**

being taken in a very limited area at Seguam Pass which is the portion of a bank that falls outside several 20 nm sea lion closures circles.

## Objectives:

### 1. Continue to avoid jeopardy and adverse modification.

- Is there additional fishing effort inside of SSL critical habitat? **Yes.** But this mackerel effort would occur in an area where SSL numbers are increasing and would remove some of the fishing pressure off Aleutian Islands management areas to the west where SSL numbers have continued to decline. The re-establishment of some Bering Sea mackerel fishing areas would also reduce the current pressure at Seguam where nearly all of the AI 541 mackerel catches are currently occurring. .
- Does the proposal provide trade-offs that reduce the total negative effects to SSL? **No.** Proposal itself is intended to provide benefits to SSL.
- Does the proposal open a substantial amount of critical habitat? **Currently all of SSL sites in the Bering Sea are closed to directed mackerel out to at least 20 nm. This effectively closed all Bering Sea mackerel grounds. During the development of the current SSL regulations, Protected Resources was interested in shifting a portion of the mackerel fishery to the Bering Sea to reduce mackerel catches in the western Aleutian Islands. This would accomplish that objective.**
- Does proposal indirectly provide protection to additional sites? **No but by shifting mackerel fishing to the east it does so indirectly. Most of the mackerel catch in Central and Western AI is taken in SSL CH areas between 10 and 20 nm from SSL sites. This proposal supports a fishery that shifts some of that fishing to areas where SSL numbers are increasing.**
- Does proposal indirectly affect nearby SSL sites? **See above answer.**

- Does proposal affect important research site? (eg Chiswell) **No**
- Does proposal offer additional measures to control fishing rate or effort? **Yes. The proposal does limit the percentage of the AI 541 TAC that can be taken inside the Bering Sea areas that are re-opened to mackerel fishing. The limit is not to exceed 50% of the AI 541 TAC.**
- Does the proposal affect an SSL site that has special importance? (eg. Marmot) **Don't think so.**
- Does the proposal reduce the no-fishing time between end of year (December) and first of year (January) fisheries at a critical time for SSL? **No.**
- Does proposal shift effort into a time/space or prey availability level that may have negative effect on SSL? **The shift should be in a positive direction for SSL.**
- Does the proposal affect the number of fishing days required to harvest the quota? **Probably not. Re-opening these Bering Sea fishing areas is not expected to increase the catch rate of 541 mackerel. It may allow the catch rate to be reduced because instead of gearing up for the current 541 Seguam fishery that typically lasts less than one week (even with the increased 541 TAC), the re-establishment of Bering Sea mackerel fishing areas may allow for slower mackerel catch rates and periodic mackerel fishing throughout the year.**

## 2. Encourage development of a sound experimental design for monitoring.

This proposal does not add any new advantages or encouragement for an adaptive management experiment

## 3. Minimize adverse social and economic impacts.

- Does the proposal provide economic benefits? **Yes, shifting more of the mackerel TAC to the 541 management area has economic benefits because mackerel for the area are larger and worth**

more. But additional fishing grounds are needed to help sustain the AI 541/Bering Sea mackerel fishery.

- What is the impact upon harvesting and/or processing efficiency? Bigger mackerel means higher retention rates. Some mackerel fishing outside of the HLA and out west due to SSL regulations is forced to occur in areas where mackerel can be relatively small. This has tended to increase discard rates. With the shift of TAC to a greater proportion in AI 541, incentives for higher retention rates are created.
- Does the proposal have any effects on other fisheries? For the non-Amendment 80 sector of the mackerel fishery in 541 (up to 10% of TAC), this proposal may allow mackerel to be harvested and delivered to places other than Adak. This proposal is neutral on this issue and if this proves to be problematic for the non-Amendment 80 sector, we would be agreeable to modifying the proposal to apply on to the Amendment 80 sector mackerel fishery.
- Will the proposed action be further affected by recent or pending council actions? No.

#### 4. Minimize bycatch of PSC and other groundfish.

- Does the proposal potentially create bycatch issues in other SSL prey species? NO.
- Does the proposal potentially create bycatch issues in PSC species? NO. The industry has already addressed the halibut bycatch issue with Bering Sea and AI 541 mackerel fishing. Now under Amendment 80, anyone wishing to fish in the Bering Sea for mackerel would have incentives to manage their halibut bycatch such that they do not use too much of their coop's allowed halibut bycatch for mackerel fishing.
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#### 5. Promote safety at sea.

6. Does the proposal reduce or increase safety for the fleet? Yes. Regaining access to mackerel grounds close to Dutch Harbor could increase safety by allowing smaller boats to fish mackerel without going out west where weather tends to be worse, fewer boats are in the areas, and search and rescue assets are not as available.
7. Minimize adverse impacts to threatened and endangered species in the BSAI and GOA No effects either way